

COPY

Oct 30, 2005

Chief Justice Miguel S. Demapan
CNMI Supreme Court
House of Justice Building
PO Box 502165
Saipan, MP 96950

Dear Chief Justice Demapan:

In the past seven months, I have written the attached 15 letters and follow-ups to the clerks of the CNMI supreme court and superior court requesting documents on file in those courts in case file CV 96-1320 in Superior Court and in file No 2000 016 and 2000 023 (Consolidated) in the CNMI Supreme Court. The attached letters are dated as follows:

May 5, 2005
Sep 9, 2005
May 20, 2005
Oct 5, 2005
Oct 13, 2005
Oct 17, 2005
Oct 5, 2005
Apr 5, 2005
May 13, 2005
May 20, 2005
July 26, 2005
Aug 9, 2005
Aug 12, 2005
Aug 16, 2005
Sep 9, 2005

Many of the above letters were sent by express mail, certified mail or tracking confirm mail. I have these receipts or tracking numbers and can supply them to you if you need them. I have received no reply on any of the above letters.

(15)

EXHIBIT
A

In telephone calls to the Superior court clerk's office, employees often have orally confirmed receiving my letters. In one case, about postal receipt documents requested in the case 96-1320 file, Ms Sablan told me that the receipts are not now in the file. Otherwise, I have had no reply or acknowledgment on any of the items requested.

In all cases, I sent checks with my request. I will note that none of the checks sent, as described in the letters, were cashed by the CNMI

Simply stated, I want the documents requested or communications in writing from your courts that the documents are either not available or what further steps must I take to obtain copies of the documents as I have requested.

Since you are the chief judicial officer in charge of the CNMI courts, I hereby make a call upon you, by copy of this letter, for the documents or written communications on each of my requests on why the documents cannot be supplied.

Your prompt attention to this need will be appreciated. Thanking you, I am,

Yours very truly,



Robert D. Bradshaw
PO Box 473
Calder, ID 83808
Phone 208-245-1691

(C)OPY

May 5, 2005

Clerk of the CNMI Supreme Court
Attention Crispin M Kaipat
PO Box 502165
House of Justice Building
Saipan, MP 96950

Dear Sir:

I was a party to CNMI Superior Court 96-1320, which was appealed and handled in your court as appeal No 2000-016 and 2000-023 (Consolidated) with the hearing held on Mar 28, 2002. Would you please be good enough to mail me a certified true copy of the trial court/the superior court, transcript for case 96-1320 which was used by the Supreme Court in its hearing.

I am not sure of the number of pages or the cost per page (which is reportedly to me no more than 25 cents per page). In any case, I am enclosing my check for \$30 dollars. Can you send me a copy of this transcript as on file in your case file? If \$30 is not enough, please advise me. My address and phone number are below. I am here almost daily from 2 PM until 10 PM my time or 8 AM to 4 PM your time.

Thanking you, I am, yours very truly,

Robert D. Bradshaw
PO Box 473
Calder, ID 83808
Phone 208-245 1691

(17)

COPY

Sep 9, 2005

Ms Bernie Sablan, Clerk of the Superior Court
PO Box 500307,
Saipan, MP 96950-0307
FAX 670-236-9741, Phone 670-236-9740

Dear Ms Sablan:

Would you please be good enough to check once more on the possibilities of me getting cassette recordings of the actual court hearing on case 96-1320 in Feb 2000, as per our earlier conversation and my letter of May 20, 2005, copy attached. I do need these recordings badly and almost four months have passed.

I sent you two postage stamps earlier totaling \$7.70 for priority mail back and the needed cassette tapes blank. If a payment is needed from me, please advise me and I will send you a check.

Your help will be much appreciated. Thanking you, I am,

Yours very truly,


Robert D. Bradshaw
PO Box 473
Calder, ID 83808
Phone 208-245-1691

COPY

May 20, 2005

Ms Bernie Sablan
Clerk of the Superior Court
PO Box 500307
Sasipan, MP 96950-0307

Dear Ms Sablan:

Thank you for the information you shared with me on the phone on the fact that Sorenson does not have anything on file with you withdrawing from Bisom (I sure would appreciate your certification of that fact in writing as we discussed). The background on my complaint is that I have alleged that Bisom/Sorenson committed fraud in this case by presenting alleged postal return receipts to effect service on me which did not occur.

The AG has had possession of Case file 96-1320 since Sep 12, 2004 until recently. SO if the return postal receipts are not in the file, it means that the AG has them. If you locate them, can you make a copy, front and back, on those that allegedly came from me. Also, if there are any return of service filings on alleged service to me, can you make me a Xerox copy and send them to me (there should be several of them)?

Finally, per your conversation on the sound recordings, enclosed are 12 cassettes, all now cleaned with no present recordings. Each are numbered in sequence, from one to 12---1 to 10 are thirty minutes each front and back (one hour total) and I think the last two may run about two hours in total. If possible, please use these in sequence, starting with number 1.

The US post office has priority mail boxes available at a flat rate of \$7.70. Enclosed are \$7.70 in stamps which you may use if desired to mail these cassettes back to me. Also, enclosed is my check for \$3.00 to cover the cost of copies of the return postal receipts and the return of service or service certification forms which deal with me in case file 96-3120.

Finally, on the material sent you last week. The motions before the court were all served by me on the AG, Sorenson and the law firm of Ramsden and Lyons in Idaho which are now representing Bisom. Thanking you, I am,

Yours very truly,

Robert D. Bradshaw
Robert D. Bradshaw
PO Box 473, Calder,
ID 83808,
Phone 208-245-1691.

(19)

COPY

Oct 13, 2005

Ms. Bernie Sablan
 Clerk of the Superior Court
 PO Box 500307
 Saipan, MP 96950-0307

Dear Ms. Sablan:

COPY

Oct. 5, 2005

Ms. Bernie Sablan
 Clerk of the Superior Court
 PO Box 500307
 Saipan, MP 96950-0307

Dear Ms. Sablan:

Can you please send me certified true copies of the following per the 96-1320 docket? Five checks are enclosed to cover the same:

02/14/00 Request, for Entry of Default, Declaration of Jay H. Sorensen, Entry of Default. Check for \$10.60 enclosed
 02/16/00 Supplement, Declaration in Support of Entry of Default. Check for \$10.60 enclosed
 02/22/00 Order Denying Motion to Remove Case from Trial Docket, check enclosed for \$10.60
 02/25/00 From Judge Castro to Edward Manglona, jury foreperson, check enclosed for \$11.20
 About Aug 1 to 14, 2005, Opposition to Motion to Void/Vacate Judgment from Jay H. Sorensen in 14 pages, check for \$14.20 enclosed.

Checks are enclosed to cover each of the five documents requested. If more is needed, please bill me.

Thank you much for your help.

Yours very truly,

Robert D. Bradshaw
 Robert D. Bradshaw
 PO Box 473,
 Calder, ID 83808.
 Phone 208-245-1691.

COPY

Oct 13, 2005

Ms. Bernie Sablan
Clerk of the Superior Court
PO Box 500307
Saipan, MP 96950-0307

Dear Ms. Sablan:

Can you please send me certified true copies of the following per the 96-1320 docket: Eight checks are enclosed to cover the same:

06/30/97 Proof of Service, Jay Sorensen, check enclosed for \$11.50
09/15/99 Certificate of Service, David Sosebee, Check enclosed \$10.60
09/18/99 Certificate of Service, David Sosebee, Check enclosed \$10.60
02/01/00 Motion to remove case from jury trial docket. Check enclosed \$11.50.
02/03/00 Opposition to Motion to Remove Case from Jury Trial docket. Check enclosed \$11.50
02/15/00 Motion for Judgment as a Matter of Law on Plaintiff's Claim for Indemnification Against defendant, CNMI, Check enclosed for \$10.90
02/16/00 Opposition to Motion for Judgment as Matter of law and Motion to reopen Evidence, Check enclosed for \$10.90
02/17/00 Plaintiff's requested Jury Instructions, Check enclosed for \$11.20

Checks are enclosed to cover each of the eight documents requested. If more is needed on this, please advise me or bill me.

Thank you much for your help.

Yours very truly,


Robert D. Bradshaw
PO Box 473,
Calder, HI 83808,
Phone 208-245-1691.

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COPY

Oct 17, 2005

Ms Bernie Sablan
Clerk of the Superior Court
PO Box 500307
Saipan, MP 96950-0307

Dear Ms Sablan:

Can you please send me certified true copies of the following per the 96-1320 docket: Seven checks are enclosed to cover the same:

04/02/97 Letter, Check for \$10.60 enclosed.
08/03/99 Notice of Motion and Motion for Partial Summary Judgment. Check for \$11.50 enclosed.
08/03/99 Memorandum of Points and Authorities in Support of Motion for Partial Summary Judgment. Check for \$11.20 enclosed
08/05/99 Affidavit of Plaintiff in support of Motion for Partial Summary Judgment. Check for \$10.60 enclosed.
08/18/99 Affidavit of Plaintiff in Support of Motion for Partial Summary Judgment. Check for \$10.60 enclosed.
08/30/99 Response to Plaintiffs Motion for Partial Summary Judgment Check for \$11.20 enclosed.
09/03/99 Reply to Opposition to Motion for Partial Summary Judgment. Check for \$11.20 enclosed.

Checks are enclosed to cover each of the seven documents requested. If more is needed on this, please advise me or bill me and I will send payment. I have overpaid on some of the earlier checks sent so my account with your office should be in good shape.

Thank you much for your help.

Yours very truly,

Robert D. Bradshaw
Robert D. Bradshaw
PO Box 473,
Calder, ID 83808,
Phone 208-245-1691.

22

COPY

Oct 5, 2005

Ms Bernie Sablan, Clerk of the Superior Court
PO Box 500307, Saipan, MP 96950-0307

Dear Ms Sablan:

Would you please be good enough to help me?

In the last several months, I have ordered several documents on case 96-1320 which I have not yet received from your office. Attached are copies of my letters to you which outlined the needed documents and my tender of payment for them. I am not sure of the charges, but you can either use my check or check or bill me, however you desire. The letters are:

April 5, 2005
May 13, 2005
May 20, 2005
Jul 26, 2005
Aug 9, 2005
Aug 12, 2005
Aug 16, 2005
Sep 9, 2005

Thanking you, I am

Yours very truly,

Robert D. Bradshaw
PO Box 473
Calder, ID 83808
Phone 208-245-1691

23

Received Apr-16-2007 04:19

To- US DISTRICT COURT, N

From -

Page 004

COPY

April 5, 2005

Ms Bernie Sablan
Clerk of the CNMI Superior Court
PO Box 500307
Saipan, MP 96950, phone 670-236-9766/9767

Dear Ms Sablan:

Would you please be good enough to make and supply to me one certified true copy of the transcript of the court record of trial in February 2000 in Superior Court Civil case 96-1320 and one each certified true copies of each of the postal receipts, front and back, submitted to the court and entered into evidence as exhibits in case 96-3120.

I don't know how many pages are involved here, but I am enclosing my check for \$30 payable to your office to cover the charges. If this is not enough, please bill me for any additional needs or telephone me and I will forward a check for the additional needs.

Thanking you, I am,

Yours very truly,



Robert D. Bradshaw

PO Box 473
Calder, ID 83808, Phone 208-245-1691

24



COPY

May 13, 2005

Ms Bernie Sablan
Clerk of the CNMI Superior Court
PO Box 500307
Saipan, MP 96950, phone 670-236-9766/9767

Dear Ms Sablan:

On April 5 and April 18, 2005, I sent your office checks for \$35 requesting certified true copies of certain documents on file in your office on CNMI Superior Court Case 96-1320 (the \$5 was cashed but the \$30 is still outstanding). If there is a problem with this request, would you please notify me at once--please in writing and by mail.

I requested certified true copies of the transcript of this trial in Feb-Mar 2000 (in our last conversation, you did note a problem with this in that no transcript may be available, so possibly I could obtain a copy of the actual court vocal/sound recording, which would suffice for me. If so, is \$30 enough?). the postal receipts filed in this case alleging service on defendant Bradshaw, and the fourth amended complaint filed by plaintiff Bisom on this case in late 1998 (which you said that you would mail). So far, I have not received copies of these documents which I need in the matter of this case and the motion I now have before the court. Can you please send me the documents requested or a letter stating the problem?

If there is any problem or question over sending me these requested documents, please advise me at once in writing at the below address. Thanking you, I am,

Yours very truly,

Robert D. Bradshaw
Robert D. Bradshaw
PO Box 473
Calder, ID 83808
Phone 208-245-1691

25

COPY

May 20, 2005

Ms Bernie Sablan
Clerk of the Superior Court
PO Box 500307
Sasipan, MP 96950-0307

Dear Ms Sablan:

Thank you for your assistance in getting the documents needed for my motion now before your court. As I noted in my recent phone conversation, I also have an action against Bisom in the US District Court in Idaho. In that court, Mr Sorenson now claims that he does not represent Mr Bisom. Likely he will make the same claim in the CNMI Superior Court on my motion now before the court.

Anyway, please check your records once more and let me know if indeed Sorenson has filed documents with your court withdrawing from representing Bisom or terminating his representation of Bisom. If so, I particularly need to know the date you received such a document.

Separately, I have already asked for a copy of any such alleged document. If you do not find such a document, would you please be good enough to make me an affidavit or certification that such a record is not in the CNMI 96-1320 case file or your other applicable files. Enclosed are a couple of possible examples or forms you might be willing to use. Please bill me for your certification/affidavit if you can use one of these forms. I will telephone you soon on clarifying this request.

If you should not wish to sign an affidavit or certification, perhaps you could just write me a letter on your stationary outlining your due search and inability to find any documentation from Sorenson terminating his representation of Bisom.

Yours very truly,

Robert D. Bradshaw
PO Box 473,
Calder, ID 83808.
Phone 208-245-1691.

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COPY

Jul 26, 2005

Ms Bernie Sablan, Clerk of the Superior Court
PO Box 500307, Saipan, MP 96950 0307

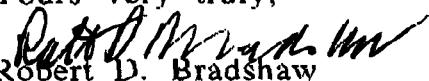
Dear Ms Sablan:

Can you please send me copies of the following per the 96-1320 docket:

06/30/97 Proof of Service, Jay Sorensen
12/22/98 Certificate of Service--William Bush
05/04/99 Certificate of Service--William Bush
06/29/99 Certificate of Service--William Bush
08/05/99 Certificate of Service--William Bush
08/18/99 Original Signature, of the Affidavit in Support of Motion
08/18/99 Affidavit of Plaintiff in support of motion Partial Summary Judg
08/19/99 Certificate of Service--William Bush
09/01/99 Certificate of Service--David Sosebee
09/08/99 Certificate of Service--David Sosebee
09/13/99 Certificate of service--David Sosebee
09/18/99 Certificate of Service--David Sosebee
01/31/00 Certificate of Service--Jay H. Sorensen
02/01/00 Motion to remove case from Jury Trial Docket
02/01/00 Certificate of Service--David Sosebee
02/03/00 Opposition to Motion to Remove Case from Jury Trial Docket
02/04/00 Certificate of Service--David Sosebee
02/15/00 Motion--judgment matter of law Plaintiff claim Indemnification
02/16/00 Opposition--Motion for judgment matter of law
02/17/00 Plaintiff's Requested Jury Instruction
02/24/00 Memorandum--Judge Castro to Edward Manglona
03/23/00 Certificate of Service--David Sosebee
07/24/00 Certificate of Service--David Sosebee
07/31/00 Certificate of service--David Sosebee
08/01/00 Certificate of Service
05/21/01 Certificate of Service--David Sosebee
07/10/01 Certificate of Service--to David Sosebee
10/01/01 Certificate of Service

My check for \$25.00 is enclosed. If more is needed, please bill me.

Yours very truly,


Robert D. Bradshaw

PO Box 473, Calder, ID 83808, Phone 208 245-1691.

~~COPY~~

Aug 9, 2005

Ms Bernie Sablan, Clerk of the Superior Court
PO Box 500307,
Saipan, MP 96950-0307
FAX 670-236-9741, Phone 670-236-9740

Dear Ms Sablan:

This is being sent by FAX in the interest of time.

Can you please send me a copy of the April 2, 1997 letter in case file 96-1320. If it is OK, please mail it to be at your earliest convenience. Or better yet, if convenient, can you FAX it to me at FAX telephone number 208-245-4991 ?

Please take the charges for this letter out of one of my checks in your office; or if you prefer, please bill me and I will send payment. I do need this letter so will appreciate your help on it.

Yours very truly,

Robert D. Bradshaw
PO Box 473
Calder, ID 83808
Phone 208-245-1691

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COPY

Aug 12, 2005

Ms Bernie Sablan, Clerk of the Superior Court
PO Box 500307, Saipan, MP 96950-0307

Dear Ms Sablan:

Thank you for your help. Can you please send me copies of the following per the 96-1320 docket:

12-31-96 Notice to Plaintiff of Removal to federal court
5 20 97 Stipulation, Re Motion and Motion for more Definite Statement
6-30-97 Proof of service Jay Sorensen
7-10-97 Stipulation for Extension of time to file opposition, order theron
3-23-98 Letter to Clerk of Court Jovita Flores, copies of documents filed at district court, vol 1 to v.
08-05-99 Notice of Motion for Partial Summary Judgment
08-05-99 Memorandum of Points and Authorities of Motion for Partial summary Judgment
08-05-99 Affidavit of Plaintiff in support of motion for partial summary judgment

Copies of all proofs of service filed by Robert Bisom/Jay Sorensen after 6-30-97 and all supporting documentation with these filed "proofs." The docket only lists one proof filed on 6-30-97. But there were several more of these alleged proofs reportedly in the file--possibly these proofs were filed during the trial as exhibits.

My check for \$8.00 is enclosed. If more is needed, please bill me.

Thanking you, I am

Yours very truly,

Robert D. Bradshaw
PO Box 473
Calder, ID 83808
Phone 208-245-1691

Received Apr-16-2007 04:28 From To-US DISTRICT COURT, N Page 001

Mar 12, 2006

Clerk of the Superior Court
PO Box 500307
Saipan, MP 96950-0307
Phone 670-236-9740
Fax 670-236-9741

Dear Ms. Sahlan,

COPY

Dec 21, 2005

Clerk of the Superior Court

COPY

Ms Bernie Sablan, Clerk of the Superior Court
PO Box 500307, Saipan, MP 96950-0307

Dear Ms Sablan:

Thank you for your help. Can you please file the enclosed Third Amended Answer to Plaintiff's Opposition to Motion to Void/Vacate Judgment in case 96-1320, in three copies. Also enclosed is a page one of the answer. Can you please date stamp the page one received and return this page one to me in the enclosed stamped return envelope.

Last, in looking through the docket you sent, I did not find a reference to the exhibits entered at the trial in Feb 2000. Can you check the case file and mail me a copy of the listings of the exhibits filed by the plaintiff and defendant CNMI at the trial? Your help will be appreciated.

My check for \$2.00 is enclosed. If more is needed, please bill me.

Thanking you, I am

Yours very truly,

Robert D. Bradshaw
PO Box 473
Calder, ID 83808
Phone 208-245-1691

Received Apr-16-2007 04:34 From To-US DISTRICT COURT, N Page 001

COPY

Sep 9, 2005

Ms Bernie Sablan, Clerk of the Superior Court
PO Box 500307,
Saipan, MP 96950 0307
FAX 670-236-9741, Phone 670-236-9740

Dear Ms Sablan:

Would you please be good enough to check once more on the possibilities of me getting cassette recordings of the actual court hearing on case 96-1320 in Feb 2000, as per our earlier conversation and my letter of May 20, 2005, copy attached. I do need these recordings badly and almost four months have passed.

I sent you two postage stamps earlier totaling \$7.70 for priority mail back and the needed cassette tapes blank. If a payment is needed from me, please advise me and I will send you a check.

Your help will be much appreciated. Thanking you, I am,

Yours very truly,

Robert D. Bradshaw
PO Box 473
Calder, ID 83808
Phone 208-245-1691

31

COPY

Dec 21, 2005

Clerk of the Superior Court
PO Box 500307
Saipan, MP 96950-0307

Dear Ms Sablan:

Thank you for the two packets of material sent me recently in response to my letters of Oct 5, 13 and 17. In going through the items, there were a couple of problems.

First, two letters were not enclosed. Per the Oct 13 request, the certificate of service of 09/18/99 on David Sosebee was not sent me. And per the Oct 17 letter, the letter on the docket of 04/02/97 was not sent. You did send a letter of Jun 2, 1997 which might have been confused somehow (I will cover it in a separate letter to you).

Last, there were several attachments, enclosures and exhibits to the motions involved which were not included in the mailings to me. These attachments and enclosures are a part of the file for that docketed item and I do need them. They are as follows:

The 08/30/99 Response to Plaintiff's Motion for Partial Summary Judgment mentions an exhibit which were not present with the motion sent me.

The 09/03/99 Reply to Opposition to Motion for Partial Summary Judgment makes mention of an attachment in the form of a letter of Aug 27, 1999 (on page 14 of the reply). This attachment was not included with the reply.

The 02/01/00 Motion to Remove Case from Jury Trial Docket cites four exhibits which were not attached in the motion sent me.

The 02/03/00 Opposition to Motion to Remove Case from Trial Docket mentions an attached letter which was not furnished with the Motion.

The 02/17/00 Plaintiff's Jury Instructions mentions some attached documents. These attachments were not included in the mailings sent to me.

Can you please furnish me above documents--perhaps you can send the whole document per the docket filing or at least send me the attachments and I can attach them to the proper filings. Your help on this matter will be appreciated. Thank you much.

Yours very truly,

Robert D. Bradshaw
PO Box 473, Calder, ID 83808,
Phone 208-245-1691.

32

EX 1411317
B

Mar 12, 2006

Clerk of the Superior Court
PO Box 500307
Saipan, MP 96950-0307
Phone 670-236-9740
Fax 670-236-9741

Dear Ms Sablan:

Thank you for your letter of Jan 18th and your offer to help me get the documents on file in case 96-1320 as I previously requested. Yes, there still seems to be several things hanging which I did not receive.

Enclosed is a copy of my letter of Dec 21, 2005 asking about the status of my privileged letter to the AG of Jun 2, 1997 and how it came to be in the 96-1320 case file separately from my motion to void where it was attached as an exhibit. May I please hear from you on this question?

In looking through my requests, I did request a copy of the letter of 04/02/97 which is shown on the docket. It might be that the letter of Jun 2, 1997 was sent to me by mistake for the 04/02/97 letter. In any case, I did request and paid for the 04/02/97 letter twice and I never received it. Can you have Zerlina either mail me a copy or fax it to me at 208-245-4991. I will appreciate it.

Thank you very much for your help.

Yours very truly,



Robert D. Bradshaw
PO Box 473,
Calder, ID 83808,
Phone 208-245-1691.

33

Exhibit 1
C

COPY

Dec 21, 2005

Clerk of the Superior Court
PO Box 500307
Saipan, MP 96950-0307

Dear Ms Sablan:

In the accompanying letter on the documents sent me per my letters of Oct 5, 13 and 17, you sent me a copy of my letter of June 2, 1997 which I sent the AG, Doug Cotton. This letter of June 2, 1997 is not on the case file docket maintained by your office and it is not mentioned in any of the documents in that file that I now have before 2005.

As a matter of information, this letter was a privileged letter from me to the AG which I first brought to the court's attention in my Motion to Void/Vacate Judgment filed in March 2005 and in the later Amended Motion to void/vacate Judgment filed in May 2005. This letter was the first letter in Exhibit B in those two motions.

It is now a mystery to me how this letter appears in a single form in your 96-1320 case file. Is it possible that it was somehow detached from my Motion to Void/Vacate judgment and now may be a loose document in the case file? Can you check the case file and let me know what the status is of this letter from me to Doug Cotton on June 2, 1997. It should not be a part of the case file beyond an attachment in Exhibit B to my motion to void/vacate judgment in 96-1320.

Thank you much for your help.

Yours very truly,

Robert D. Bradshaw
PO Box 473,
Calder, ID 83808,
Phone 208-245-1691.

34

EXH 1320
JC

COPY

Jul 13, 2006

Ms Bernie Sablan:
Clerk of the Superior Court
PO Box 500307
Saipan, MP 96950-0307
Phone 670-236-9740; Fax 670-236-9741

Dear Ms Sablan:

This letter is being sent by both fax and US mail.

Attached are three letters showing documents that I have requested from the Superior Court. I have received none of these to date; though I sent checks and my checks were apparently all cashed by your office except for one of the \$10.60 checks in the May 16th letter asking for copies of the receipts.

Also, the \$4 check has not been cashed yet as cited in my Jun 14th letter. As you know I am preparing for the Supreme Court hearing and I badly need these documents at once. Can you please sent them to me as quickly as possible?

Thank you very much for your help.

Yours very truly,



Robert D. Bradshaw
PO Box 473,
Calder, ID 83808,
Phone 208-245-1691.

35

EXHIBIT
D

COPY

Jun 14, 2006

Ms Bernie Sablan:
Clerk of the Superior Court
PO Box 500307
Saipan, MP 96950-0307
Phone 670-236-9740
Fax 670-236-9741

Dear Ms Sablan:

Thank you for your letter of Jun 2, 2006 and your offer of help. Actually, as you know, I have requested a number of items which were never sent me. I understand the pressure you are probably under on supplying me documents. But I do appreciate your help.

My next needs are copies of the trial docket and list of trial exhibits filed in case 96 1320 at the trial in the year 2000. You may know this trial docket as the case action summary sheet, trial journal or perhaps the Clerk's minutes. Whatever you call it, I need a copy of that document and the list of exhibits filed in court during the trial. Enclosed is my check for \$4.00 to cover the two documents. I do not need a certified copy. A simple Xerox copy of each document will suffice.

Thank you very much for your help

Yours very truly,

Robert D. Bradshaw
PO Box 473,
Calder, ID 83808,
Phone 208-245-1691.

36

May 16, 2006

COPY

Ms Bernic Sablan:
Clerk of the Superior Court
PO Box 500307
Saipan, MP 96950-0307
Phone 670 236 9740
Fax 670-236-9741

Dear Ms Sablan:

Would you please be good enough to send me the following documents and any and all attached exhibits and enclosures as certified true copies in the 96-1320 case file:

Copy of return of service and original return postal receipts filed by Mr Bisom in case 96-1320 showing service by mail on Defendant Bradshaw. Check for \$10.60 enclosed.

Copy of original US postal return receipts showing mailings to Defendant Bradshaw by the CNMI AG. Check enclosed for \$10.60.

Please include copies of all exhibits and attachments to the documents. If I have failed to send the right amounts of money, please bill me and I will send further payment.

Thank you very much for your help. I appreciate it.

Yours very truly,

Robert D. Bradshaw
PO Box 473,
Calder, ID 83808,
Phone 208-245-1691.

71

COPY**May 16, 2006**

Ms Bernie Sablan:
Clerk of the Superior Court
PO Box 50030/
Saipan, MP 96950-0307
Phone 670-236-9740
Fax 670-236-9741

Dear Ms Sablan:

Would you please be good enough to send me the following documents and any and all attached exhibits and enclosures as certified true copies in the 96-1320 case file:

- The Amended Complaint filed on 05/01/97. Check for \$18.10 is enclosed.
- The Stipulation and Order of 05/20/97. Check for \$10.90 enclosed.
- The Second Amended Complaint of 05/30/97. Check for \$18.10 enclosed.
- The Order of 08/07/97. Check for \$10.60 enclosed.
- The Order of 09/13/99 Continuing Trial. Check for \$10.60 enclosed.
- The Decision and Order of 02/02/00. Check for \$10.90 enclosed.
- The Verdict Form of 02/25/00 with Special Findings to Defendant Robert Bradshaw. Check for \$10.30 enclosed.
- The Application for Attorney's Fees and Declaration of 03/01/00. Check of \$10.90 enclosed.
- Acknowledgment Satisf of Judgment 03/14/03. Check for \$10.30 enclosed.

Please include copies of all exhibits and attachments to the documents. If I have failed to send the right amounts of money, please bill me and I will send further payment.

Thank you very much for your help. I appreciate it.

Yours very truly,

Robert D. Bradshaw
PO Box 473,
Calder, ID 83808,
Phone 208 245-1691.

uditor's suit

By Cherrie Anne E. Villahermosa
Variety News Staff

THE CNMI government, a former attorney general and three former assistant attorneys general have filed a motion to dismiss the second amended complaint of Robert D. Bradshaw, a former temporary public auditor.

Pamela Brown, Nicole C. Forelli, William C. Bush and Douglas Cotton, through attorney Kristin D. St. Peter, filed the motion in the U.S. District Court for the NMI on Monday.

The motion will be heard on Aug. 10 at 9 a.m. The defendants said Bradshaw failed to state a claim upon which relief can be granted.

They said the matter is already moot due to Superior Court Associate Judge Juan T. Lizama's Dec. 29, 2005 order vacating the default judgment against Bradshaw.

According to the defendants, the facts do not show that Bradshaw's federally protected rights were violated.

Robert Bisom who was hired as legal counsel for the Office of the Public Auditor in 1993, filed a lawsuit against the CNMI and Bradshaw on Dec. 5, 1996 when his employment was terminated in Dec. 1993. Bradshaw, as temporary public auditor in Nov. 1993, caused Bisom's employment to be terminated.

On Dec. 6, 1996, Douglas Cotton in his capacity as an assistant attorney general, sent Bradshaw a letter advising him that Bisom had filed suit and telling Bradshaw to expect service of a summon and complaint. Bradshaw wrote a handwritten letter to Cotton on Jan. 31, 1997 stating: "I will not authorize the CNMI to accept service for me at this time."

On Feb. 25, 2000, a jury awarded Bisom a \$110,300 judgment against the CNMI and a default judgment totaling \$139,000 for compensatory and punitive damages against Bradshaw in his individual capacity.

In Sept. 2005, Bradshaw asked the Superior Court to set aside the judgment entered against him. On Dec. 29, 2005, Judge Lizama vacated the default judgment against Bradshaw that served as basis of most, if not all of his allegations against the CNMI government.

The federal court dismissed Bradshaw's amended complaint on Feb. 21, 2006 but allowed him to file a second amended complaint.

39947

EXH 1817
E



Commonwealth of the Northern Mariana Islands
Office of the Attorney General RECEIVED

2nd Floor Hon. Juan A. Sahian Memorial Bldg.
 Caller Box 10007, Capitol Hill
 Saipan, MP 96950

MAY - 5 2006

Clerk
 May 5, 2006 District Court
 The Northern Mariana Islands

Civil Division
 Tel: (670) 664-2341/42
 Fax: (670) 664-2349

Criminal Division
 Tel: (670) 664-2366/67/68
 Fax: (670) 234-7016

Investigative Unit
 Tel: (670) 664-2310/12
 Fax: (670) 664-2319

Division of
 Immigration

Saipan
 Tel: (670) 236-0922/23
 Fax: (670) 664-3190

Probate
 Tel: (670) 532-9436
 Fax: (670) 532-3190

Thrift
 Tel: (670) 433-3712
 Fax: (670) 433-3730

Domestic Violence
 Intervention Center
 Tel: (670) 664-4332/4
 Fax: (670) 234-4589

Hon. Alex R. Munson, *Chief Judge*
 U.S. District Court for the Northern Mariana Islands
 2nd Floor, Horiguchi Building, Garapan
 P.O. Box 500687
 Saipan, MP 96950

Re: Bradshaw v. CNMI, et al. CV-05-0027

Dear Judge Munson:

I understand that Jay H. Sorensen's motion to dismiss in the matter of Bradshaw v. CNMI is scheduled to be heard by the Court on May 25, 2006 at 9:00 a.m. Although this is Mr. Sorensen's motion, the numerous parties that I represent in this case are extremely interested in the Court's ruling. Unfortunately, I will be in trial beginning the week of May 22, 2006, and thus unable to attend the oral argument.

As you know from recent filings, I intend to submit a motion to dismiss on behalf of the Commonwealth, Mr. Cotton, Mr. Bush, Ms. Forelli, Ms. Brown and, depending upon the outcome of the Plaintiff's default motion and Defendants' motions to quash, Mr. Clayton and Mr. Sosebec in June 2006. In the event Mr. Sorensen's motion to dismiss on Rule 8 grounds is granted and in the interest of judicial economy, I respectfully request that the Court consider dismissing this case *pro se* as to all Defendants.

Since our last hearing, I spoke with Mr. Sorensen regarding settlement. The issue barring settlement continues to be the civil action making its way through the Commonwealth court system. Mr. Sorensen and Mr. Bismarck are unwilling to drop their appeal in the Commonwealth Supreme Court, and when last I spoke with Mr. Bradshaw about settlement, dismissal of the Commonwealth court case was one of his prerequisites. Accordingly, it appears we are stuck.

Thank you for your consideration.

Very Respectfully,

Kristin D. St. Peter
 Assistant Attorney General

Cc:

Robert Bradshaw
 Jay Sorensen
 Civille and Tang, PLLC

40447

MEMO FOR RECORD

At about 7 PM (PST) on Feb 6, 2007, I received a telephone call from Mark Hanson, lawyer for Robert Bisom.

He reported that the AG has a new lawyer handling my case--with the name Rob Feinberg. Hanson noted that the purpose of his phone call to me is to get an agreement from me to extend the date due from both him and Mr Feinberg on my motion for summary judgment. He added that Mr Sorensen will file his opposition on time.

While Hanson did not explain why he is now representing the CNMI and CNMI AG's office on my case, that appears to be the gist of his request to me. Nor did he explain why and how it is that he knew that Sorensen would file his answer on time other than it demonstrates that as a minimum, he and Sorensen had been comparing notes. I did agree to an extension of the due date to Feb 19, 2007 for Bisom and the CNMI.

Hanson further advised me that Feinberg wants to depose me next week when the Supreme Court hears the Bisom appeal of 96-1320. Hanson then asked if I will be available on Saipan next week to be deposed by Feinberg. I said no I would not be available.

We then briefly exchanged a few items on discovery format, depositions and me getting the initial disclosure statement from him.

I declare under the penalty of perjury that the above is the general text of Mr Hanson's telephone call.

Dated at Calder, Idaho this 7th day of February 2007.



Robert D. Bradshaw, Plaintiff Pro Se

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2/16/07
BG

TO-US DISTRICT COURT, N Page 003
RECEIVED Apr-16-2007 04:42 PM
1475 AFZ 079-A1
SUPREME COURT OF GUAM
RECEIVED Apr-16-2007 04:42 PM
FROM -



E-FILED
CNMI SUPREME COURT
E-Filed: Mar 15 2007 4:16PM
Clerk Review: Mar 15 2007 4:20PM
Filing ID: 1475AFZ/9
Case No.: CV-06-0005-GA
Kwontan Grayson

IN THE
SUPREME COURT
OF THE
COMMONWEALTH OF THE NORTHERN MARIANA ISLANDS.

ROBERT A. BISOM,
Appellant,

v.

**COMMONWEALTH OF THE NORTHERN
MARIANA ISLANDS, ROBERT D. BRADSHAW,
Former Temporary Public Auditor, in his individual
capacity, et al.,**
Appellee.

APPEAL NO. 06-0005-GA
Superior Court Civil Action No. 96-1320

ORDER TO SUPPLEMENT RECORD

¶1 After oral argument on February 13, 2007, the panel met and determined it would require the parties to supplement the record pursuant to Commonwealth Rule of Appellate Procedure 47. Therefore, it is:

¶2 ORDERED, that Appellant, Robert A. Bisom, supplement the Excerpts of Record with the following documents from the Superior Court file:

42147

Exhibit
H

RECEIVED APR-16-2007 04:42 PM PAGE 004
TO- US DISTRICT COURT, N FROM: SUPREME CLERK OF COURTS
MAY-16-2007 04:42 PM PAGE 004

1. Full copies of all complaints and summonses, including all amended complaints;
2. All affidavits of service corresponding to such complaints and summonses.

¶3 These supplemental Excerpts of Record are due no later than April 13, 2007.

SO ORDERED this 14th day of March, 2007.

/s/
EDWARD MANIBUSAN
Justice *Pro Tempore*

/s/
ROBERT J. TORRES
Justice *Pro Tempore*

/s/
JOSE S. DELA CRUZ
Justice *Pro Tempore*

43 41

APPEAL NO. 06-0005-GA

IN THE SUPREME COURT
OF THE
COMMONWEALTH OF THE NORTHERN MARIANA ISLANDS

ROBERT A. BISOM,)
Appellant,)
vs.)
COMMONWEALTH OF THE NORTHERN)
MARIANA ISLANDS, ROBERT D.)
BRADSHAW, former Temporary Public)
Auditor, in his individual capacity, et al.,)
Appellee.)

APPEAL FROM THE SUPERIOR COURT
OF THE
COMMONWEALTH OF THE NORTHERN MARIANA ISLANDS

Juan T. Lizama, Associate Judge
Civil Action No. 96-1320

SUPPLEMENTAL EXCERPTS OF RECORD

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Facsimile: 86-21-50838542

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Second Floor, Macaranas Bldg.
Beach Road, Garapan
PMB 738, P.O. Box 10000
Saipan, MP 96950
Phone: (670) 233-8600
Facsimile: (670) 233-5262

44-147

Exhibit
I

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Related To Story

* Video: Coughing Girl Ordered Off Plane
Coughing Girl Ordered Off Flight

Kalani High School Group On Spring Break Trip

POSTED: 9:44 am EDT March 28, 2007
UPDATED: 9:56 am EDT March 28, 2007

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A 16-year-old girl from Hawaii was ordered off a Continental Airlines flight after she began uncontrollably coughing in her seat, according to her family and classmates.

IMAGES: More strange stories, images

Kalani High School student Rachel Collier was returning to Honolulu from a spring break trip to New York and Washington when she began to cough in her airplane seat.

"I was behind her she started coughing like I heard she couldn't breath and it felt like something was in the back of her throat," classmate Avya Tawfir said.

The girl's family said the pilot ordered the girl off the flight because she was ill.

"Upon boarding the plane (she) was asked to leave by the pilot because she had a little bit of a coughing spell," mother Stephanie Collier told KITV-TV in Hawaii. "I'm frustrated. I'm really, really frustrated. Why they would do that, especially with two teachers escorting 40 children across the United States, and for the pilot to make that kind of decision."

Collier's father, Randy, was angered over the fact that his daughter was left behind.

"When you get a call at 8:30 in the morning saying from a crying daughter you kind of get a little freaked out what's going on," he said.

Collier's classmates said several of the students on the trip had been sick and a few had gone to the hospital.

Earlier, 272 passengers were ill and there were concerns about the bird flu, but health officials said the victims on the plane were suffering from a seasonal flu.

Rachel Collier and her teacher are scheduled to return to Hawaii Wednesday night.

Watch Local 6 News for more on this story.

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Exhibit
J



Marianas Variety

Micronesia's Leading Newspaper Since 1972

Vol. 35 No. 21
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Friday, April 13, 2007

www.mvariety.com
Serving the CNMI for 35 years***Continental refuses to board ailing boy on RP flight***By Emmanuel T. Erediano
Variety News Staff

A seriously ill two year old boy suffering from kidney failure and pneumonia had to wait for another day and several hours at the Commonwealth Health Center after Continental Airlines refused to allow him to board a flight on Wednesday to Manila, the Philippines.

The boy needs special equipment for his dialysis and was on medical referral to a Manila hospital.

He was scheduled to leave on a Continental flight at 6 p.m., Wednesday, but the airline did not allow the patient to board the plane.

The boy's father, Jeffrey Tenorio, 30, told Variety in an interview yesterday that the airline wanted more exact information about his son's medical condition.

Tenorio, who works at Saipan Stevedore in safety maintenance, said he was told that his son failed to meet the airline's requirements.

This reporter was unable to get a comment from Continental as of press time yesterday. The boy has been confined at CHC since being diagnosed with kidney failure and pneumonia. His mother brought him to the hospital for the third time last weekend due to fever.

Tenorio said that after the attending physicians determined his son's condition, a medical referral to St. Luke's Medical Center in Manila was immediately worked out. The father said he was told that CHC's dialysis equipment was suited only for adult patients.

Due to the possibility that Continental Airlines might again refuse to board the boy, an insurance company managed to work out a referral to a hospital in Honolulu, Hawaii. The CHC medical referral office also managed to find a military aircraft that is coming all the way from Africa to fly the boy to Hawaii.

As of press time, the boy was still in CHC's intensive care unit where the doctors had no choice but to give the boy dialysis treatment using of the equipment for adults.

Rep. Ray N. Yumul, Ind.-Saipan, expressed disappointment at the kind of "business decision" Continental made.

"It is very disturbing," he said, adding that Continental appears to lack compassion for a critically ill child.

Yumul, who is a cousin of the boy's father, said it is fortunate that somebody at CHC was able "to arrange the boy's medical referral and an alternative means to bring him to a hospital with a suitable facility that will save the boy's life."

The military plane was expected to arrive yesterday, and the boy was scheduled to leave Saipan for Hawaii at 1 a.m. this morning.

Yumul said he will look into the possibility of legislation requiring airlines to allow passengers with medical emergencies to board their flights.

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Exhibit
K